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FILED

AUG 23 2017

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:17-CR-103 VC
)	
Plaintiff,)	STIPULATION AND
)	PROPOSED ORDER EXCLUDING TIME
v.)	UNDER THE SPEEDY TRIAL ACT
)	
KARIM BARATOV,)	
)	
Defendant.)	
)	

The parties appeared before the Court for the defendant's initial appearance and arraignment on August 23, 2017. The parties, with the consent of the defendant, hereby stipulate as follows:

1. The defendant, who resides in and is a national of Canada, waived extradition in Canada on August 18, 2017. The defendant's U.S.-based defense counsel applied to appear *pro hac vice* in this Court on August 17, 2017.
2. The FBI transported the defendant from Canada to the United States on August 22, 2017.

3. The United States has provided the defendant with initial discovery materials, and the defendant requires additional time to review the discovery and to prepare effectively with defense counsel.
4. There is good cause to exclude time under the Speedy Trial Act as the ends of justice from such an exclusion outweigh the best interest of the public and the defendant in a speedy trial. Specifically, such an exclusion provides defense counsel reasonable time for effective preparation, taking into account due diligence. 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).
5. Based on the foregoing, the parties jointly and respectfully request that the Court issue the proposed order excluding time under the Speedy Trial Act.

IT IS SO STIPULATED.

DATED: August 23, 2017


Counsel for Defendant

BRIAN J. STRETCH
United States Attorney

DATED: August 23, 2017


JEFFREY SHIH
Assistant United States Attorney

~~PROPOSED~~ ORDER TO EXCLUDE TIME

Based on the stipulation of the parties, the consent of the defendant, and on good cause shown, the Court orders that the time period from the date of this Order, through and including the date set for the next hearing on August 29, 2017, is excluded under the Speedy Trial Act. The Court bases this exclusion of time and makes the findings as stipulated by the parties above.

IT IS SO ORDERED.

Dated: August 23, 2017


HONORABLE ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE